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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

LOTFI MEHDIAN and THE MEHDIAN
126 FAMILY TRUST,

Plaintiffs,

v.

DENNIS J. ZEMBER JR., an Individual;
PRIMIS FINANCIAL CORP., a Virginia
corporation d/b/a PRIMIS BANK; and
DOES 1-20, INCLUSIVE,

Defendants.

Case No. 2:24-cv-01692 FMO(MARx)

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL WITH
PREJUDICE (FED. R. CIV. PROC.
41(a)(1)(A)(ii))**

It is hereby stipulated by and between Plaintiffs Lotfi Mehdian and the Mehdian 126 Family Trust, on the one hand, and Defendants Primis Financial Corp. and Dennis J. Zember, on the other hand (individually a “Party” and collectively “Parties”), by and through their attorneys of record, as follows:

1 **WHEREAS**, on March 26, 2024, the Court entered an order submitting the
2 Parties' claims in this litigation to arbitration, administratively closing the litigation, and
3 staying the litigation pending completion of arbitration; and

4 **WHEREAS**, the parties' arbitration has concluded and the claims in this litigation
5 have been resolved;

6 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** that,
7 pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), this action shall be and are
8 hereby dismissed with prejudice, with Plaintiffs and Defendants each bearing their own
9 costs and fees arising from this action.

10
11 Dated: November 15, 2024

COVINGTON & BURLING LLP

12 By: /s/ Kevin Hoogstraten
13 Kevin Hoogstraten

14 Attorney for Defendants Dennis J.
15 Zember, Jr. and Primis Financial
16 Corp.

17 Dated: November 15, 2024

NIKINIA LAW FIRM, INC.

18 By: /s/ Bahram Niknia
19 Bahram Niknia

20 Attorney for Plaintiffs Lotfi
21 Mehdian and The Mehdian 126
22 Family Trust
23

24 Local Rule 5-4.3.4 Certification: I hereby attest that all other signatories listed, on
25 whose behalf this filing is submitted, concur in the filing's content and have authorized
26 this filing.

27 /s/ Bahram Niknia
28 Bahram Niknia